

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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**SCOTT TURNAGE, CORTEZ D.** §  
**BROWN, DEONTAE TATE, JEREMY S.** §  
**MELTON, ISSACCA POWELL, KEITH** §  
**BURGESS, TRAVIS BOYD, TERRENCE** §  
**DRAIN, and KIMBERLY ALLEN on behalf** §  
**of themselves and all similarly situated** §  
**persons,** §

**Plaintiffs,** §

**v.** §

**BILL OLDHAM, in his individual capacity** §  
**and in his official capacity as the Sheriff of** §  
**Shelby County, Tennessee; ROBERT** §  
**MOORE, in his individual capacity and in** §  
**his official capacity as the Jail Director of** §  
**the Shelby County, Tennessee; CHARLENE** §  
**McGHEE, in her individual capacity and in** §  
**her official capacity as the of Assistant Chief** §  
**Jail Security of Shelby County, Tennessee;** §  
**DEBRA HAMMONS, in her individual** §  
**capacity and in her official capacity as the** §  
**Assistant Chief of Jail Programs of Shelby** §  
**County, Tennessee; SHELBY COUNTY,** §  
**TENNESSEE, a Tennessee municipality;** §  
**and TYLER TECHNOLOGIES, INC., a** §  
**foreign corporation,** §

**Defendants.** §

**Case No. 2:16-cv-02907-SHM/tmp**  
**Consolidated With**  
**Case No.: 2:17-cv-02015-JTF/dkv**  
**And Consolidated With**  
**Case No. 2:17-cv-02795-SMH/tmp**

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**MOTION AND SUPPORTING MEMORANDUM FOR EXTENSION OF TIME TO FILE  
ANSWER TO THIRD AMENDED COMPLAINT BY TYLER TECHNOLOGIES, INC.**

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COMES NOW Defendant Tyler Technologies, Inc. (“Tyler”) and for its unopposed motion for extension of time to file its Answer to the Third Amended Complaint states as follows:

1. On October 15, 2018, the Court entered its Order granting in part and denying in part the Motion to Dismiss submitted by Tyler.

2. The current deadline for Tyler to Answer the Third Amended Complaint is October 29, 2018.

3. In this class action, Tyler has been sued for its part in the implementation of Shelby County’s iCJIS system. In addition to Tyler, a number of other third-party vendors were also involved in the implementation of the iCJIS system, none of which Tyler has access or control over. Because of the complexity of the iCJIS system and the issues raised in this action including the interplay of non-parties, Tyler needs additional time to further investigate and fully formulate its Answer, including affirmative defenses.

4. The parties have agreed that Tyler should have a 30 day extension to November 28, 2018 to file its Answer to the Third Amended Complaint in this matter, subject to the Court’s approval of the same. This extension should have no effect on the Scheduling Order entered September 7, 2018; the next deadline provided in that Scheduling Order is May 13, 2019.

5. Counsel for the parties conferred and Plaintiffs consent to this extension.

WHEREFORE, Defendant Tyler Technologies, Inc. respectfully moves this Court for an order extending its time to file an Answer to the Third Amended Complaint to November 28, 2018.

Respectfully submitted,

s/ Bradley E. Trammell

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**COUNSEL FOR TYLER  
TECHNOLOGIES, INC.**

**CERTIFICATE OF CONSULTATION**

Brad Trammell, counsel for Defendant Tyler, consulted with Frank Watson, one of Plaintiffs' counsel, on October 22 and 24, 2018, and Plaintiffs' counsel informed Defendants' counsel that Plaintiffs consent to the requested extension of time.

s/ Bradley E. Trammell  
Bradley E. Trammell

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on October 25, 2018, a true and correct copy of the foregoing document was forwarded by electronic means through the Court's ECF System and/or email to:

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s/ Bradley E. Trammell  
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